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Attorneys for Defendant, City of Glasgow

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MONTANA GREAT FALLS DIVISION**

TAMI KAY LOFTSGAARD and  
GARTH LOFTSGAARD,  
  
Plaintiffs,

-vs-

CITY OF GLASGOW, a Municipal  
Entity, GLASGOW POLICE OFFICER  
JOSHUA NOLAN, in his individual and  
official capacity, and JOHN DOES I-IV.

Defendants.

Case No. CV-22-37-GF-  
BMM-JTJ

**DEFENDANTS'  
NOTICE OF REMOVAL**

**TO: THE HONORABLE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MONTANA.**

COME NOW, the Defendant in the above cause, City of Glasgow, and hereby  
gives notice to the above-entitled Court for removal of this cause from the Montana  
Seventeenth Judicial District Court, Valley County, to the above-entitled United

States District Court, Great Falls Division, pursuant to 28 U.S.C. § 1446, and for its grounds for removal allege:

1. This matter is a civil action alleging violations of the United States Constitution, 42 U.S.C. § 1983, assault and battery, negligence, malicious prosecution, and violations Article II, Sections 4, 10, and 11 of the Montana Constitution;

2. The action was commenced on March 30, 2022, by filing a complaint in the Montana Seventeenth Judicial District Court, Valley County;

3. The Plaintiffs are citizens of the State of Montana;

4. The Defendants are citizens of the State of Montana;

5. The above-entitled Court has jurisdiction of this case pursuant to 28 U.S.C. § 1331;

6. The undersigned represents that the Defendant City of Glasgow and all of the named Defendants consent to this removal;

7. Attached hereto and marked as Exhibit A is a copy of the Complaint;

8. This notice is filed within 30 days after receipt by the Defendant City of Glasgow of the Complaint and Summons issued by the state court; and

9. These Defendants will, upon filing of this notice of removal, give written notice to the above-named Plaintiffs and file with the Montana Seventeenth

Judicial District Court, Valley County, the notice of their filing and request for transfer pursuant to Rule 77(e), M. R. Civ. P. This case will then be removed from the state district court to the above-captioned United States District Court. See Exhibit B, Notice of Filing of Notice of Removal and Request for Transfer.

DATED this 15<sup>th</sup> day of April, 2022.

UGRIN ALEXANDER ZADICK, P.C.

By: /s/ Andrew T. Newcomer

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